

I come now to make comments in opposition to the RM-10787 rule making petition. The Morse code requirement should be retained for the General and Extra Class education and examination syllabus. Morse code, cw remains a very useful and popular mode on the HF amateur bands. In contests cw equals or exceeds QSO rates of other modes while consuming only a tenth of the bandwidth of a ssb signal. When it comes to weak signal performance nothing can match the performance of the cw mode. Typically a SSB signal would require at least a 10 db increase in power and 10 times the bandwidth to match the intelligibility of cw mode. The simple design and low cost and low power requirements of cw equipment make it a favorite of home builders. To do away with cw testing requirements would surely result in fewer new amateurs learning this useful and popular mode with the above mentioned advantages.

As for the barriers and burdens the petitioner mentions, there are all kinds of necessary burdens and barriers in life. For years and years amateurs not only met the 5 wpm present day requirement but many also met the 13 wpm and 20 wpm requirements formally in place. I submit that 5 wpm imposes no great barrier for anyone willing to invest a modest amount of time and effort. As for the burden on volunteer examineers, these volunteers have been carrying this burden with no apparent harm or damage to themselves. If any of the volunteer examineers are having difficulty with this requirement they should resign.

I respectfully submit and request the Commission to dismiss this and any other similar petition seeking to do away with cw testing requirements for General and Extra Class amateur operators.

William P. Turney, WS4Y